

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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**DANIEL BROWN JR.,**  
Plaintiff,  
v.  
**STATE OF MICHIGAN,**  
**WAYNE COUNTY,**  
**WAYNE COUNTY SHERIFF'S OFFICE,**  
**WAYNE COUNTY PROSECUTOR'S OFFICE,**  
**JOHN/JANE DOE OFFICERS,**  
Defendants.

Case: 2:25-cv-12241  
Assigned To : Grey, Jonathan J.C.  
Referral Judge: Stafford, Elizabeth A.  
Assign. Date : 7/22/2025  
Description: CMP DANIEL BROWN  
V STATE OF MICHIGAN ET AL (SS)

Case No: To be assigned  
Hon. To be assigned  
Magistrate Judge: To be assigned

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**VERIFIED COMPLAINT AND DEMAND FOR JURY TRIAL**

**(Wrongful Imprisonment, Civil Rights Violations, ADA Claims, Medical Negligence)**  
Filed in Propria Persona Pursuant to 28 U.S.C. § 1915

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**I. INTRODUCTION**

1. This is a federal civil rights action brought under 42 U.S.C. § 1983, the Eighth and Fourteenth Amendments of the U.S. Constitution, the Americans with Disabilities Act (ADA), 42 U.S.C. § 12101 et seq., and other applicable laws.
  2. Plaintiff, **Daniel Brown Jr.**, was wrongfully detained, denied critical medical care, and subjected to inhumane treatment between 2020 and 2024, resulting in severe personal injury, deprivation of liberty, and catastrophic health and financial harm.
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**II. JURISDICTION AND VENUE**

3. This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1343 (federal questions and civil rights).
4. Venue is proper in this District under 28 U.S.C. § 1391(b), as the events occurred in **Wayne County, Michigan.**

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### III. PARTIES

5. Plaintiff **Daniel Brown Jr.** resides in Detroit, Wayne County, Michigan.
6. Defendant **State of Michigan** is a governmental entity responsible for oversight of public agencies and departments involved.
7. Defendant **Wayne County** is a political subdivision of the State of Michigan.
8. Defendant **Wayne County Sheriff's Office** is responsible for the care, custody, and control of inmates.
9. Defendant **Wayne County Prosecutor's Office** oversees criminal prosecutions in the county.
10. **John/Jane Doe Officers** are unknown agents of the Sheriff's Office and jail medical staff who acted under color of law.

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### IV. FACTUAL BACKGROUND

11. In June 2020, Plaintiff was arrested and charged in Case No. 20-002931-01-FH. He was detained **without conviction** for nearly four years.
12. He was incarcerated twice — first in 2020, and again in **September 2024**, both times as a **pretrial detainee**.
13. Plaintiff was never convicted of a crime, and all charges were **dismissed in April 2024**.
14. While detained, Plaintiff suffered a **seizure, heart complications, and severe kidney issues** due to the jail's refusal to provide medication and ADA accommodations.
15. He was forced to **attend court hearings** while undergoing dialysis treatment, which endangered his life.
16. Jail staff **ignored critical medical directives**, and no ADA representative or medical advocate was ever provided.
17. On release in April 2024, Plaintiff discovered that **release paperwork was mishandled**, showing he was still incarcerated until **October 2024** — which caused his **Medicaid, Medicare, and SSI benefits to be cut off**.
18. He incurred **over \$300,000 in unpaid medical bills**, lost access to food and housing, and suffered from worsening medical conditions.

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### V. CLAIMS FOR RELIEF

#### COUNT I – Violation of 42 U.S.C. § 1983 – Deliberate Indifference to Serious Medical Needs

(Against Wayne County, Sheriff's Office, Doe Officers)

19. Defendants knew of Plaintiff's serious health conditions (kidney failure, heart disease, seizures) and intentionally ignored critical medical needs.
20. These acts constituted **deliberate indifference** and violated Plaintiff's **Eighth and Fourteenth Amendment** rights.

#### **COUNT II – Violation of the Americans with Disabilities Act (ADA)**

(42 U.S.C. § 12132 et seq.)  
(Against State of Michigan, Wayne County)

21. Plaintiff is a qualified individual with disabilities.
22. Defendants failed to provide reasonable accommodations (medications, wheelchair access, transport assistance).
23. Their failure caused Plaintiff physical injury and loss of federally protected benefits.

#### **COUNT III – Wrongful Imprisonment Compensation Act (MCL 691.1751 et seq.)**

(Against State of Michigan)

24. Plaintiff was incarcerated **without conviction**.
25. He qualifies for WICA damages under Michigan law.
26. Plaintiff seeks **\$50,000/year of confinement** and **damages for tether and hospital custody**.

#### **COUNT IV – Negligence and Gross Negligence**

(Against Wayne County and Sheriff's Office)

27. Defendants' actions breached their duty of care and constituted gross negligence.
28. Plaintiff suffered foreseeable injuries — physical, emotional, financial.

#### **COUNT V – Fourteenth Amendment – Procedural Due Process Violation**

(Against Wayne County and Prosecutor's Office)

29. The erroneous post-release processing led to the unlawful suspension of benefits, a deprivation of liberty and property without due process.

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### **VI. DAMAGES**

30. Plaintiff suffered:
  - **Physical harm** from untreated medical emergencies
  - **Psychological injuries** including PTSD and anxiety

- **Over \$300,000 in unpaid medical bills**
  - **Loss of Social Security, Medicare/Medicaid, housing, and transportation**
  - **Severe reputational damage** and stigma from tether and court appearances
  - **Increased disability** and risk of death from delayed care
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## VII. RELIEF REQUESTED

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Declare that Plaintiff's constitutional rights were violated;
  - B. Award **compensatory damages** in excess of **\$26 million**;
  - C. Award **punitive damages** to punish and deter future misconduct;
  - D. Award WICA statutory damages of **\$50,000/year** or **\$136.99/day**, plus tether and hospital time;
  - E. Issue **injunctive relief** to correct erroneous incarceration data and restore benefits;
  - F. Award **attorney fees and costs** under 42 U.S.C. § 1988;
  - G. Grant **expedited review** due to Plaintiff's worsening health and disability;
  - H. Grant such further relief as this Court deems just and proper.
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## VIII. VERIFICATION

I, Daniel Brown Jr., verify under penalty of perjury that the above statements are true and correct to the best of my knowledge.

Dated: July 22, 2025

/s/ **Daniel Brown Jr.**

Daniel Brown Jr.

In Propria Persona

16000 Puritan St., Apt 1

Detroit, MI 48227

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## **IX. CERTIFICATE OF SERVICE**

Pursuant to MCR 1.109(G) and Local Rules, I certify that on **July 22, 2025**, I submitted this Complaint via the U.S. District Court's **Pro Se Electronic Document Upload Program** and mailed a copy to:

- Michigan Attorney General – P.O. Box 30212, Lansing, MI 48909
- Wayne County Corporation Counsel – 500 Griswold St., 30th Floor, Detroit, MI 48226
- Wayne County Sheriff's Office – 4747 Woodward Ave., Detroit, MI 48201
- Wayne County Prosecutor's Office – 1441 St. Antoine St., Detroit, MI 48226

**/s/ Daniel Brown Jr.**